

United States District Court
For the Southern District of New York

Jason M. Santarcangelo, Esq. (JMS 4492)
DINES AND ENGLISH, L.L.C.
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(973) 778-7575
Attorney for Plaintiff, New Jersey Sports Productions, Inc.

NEW JERSEY SPORTS PRODUCTIONS, INC. :
d/b/a MAIN EVENTS

Civil Action No. 06 CV 1509 (HB)

Plaintiff,

v.

PANOS ELIADES, PANIX PROMOTIONS,
LTD., PANIX OF THE U.S., INC., BANNER
PROMOTIONS, INC., DON KING
PRODUCTIONS, INC. AND JOHN DOES 1-5

Defendants.

NOTICE OF MOTION FOR
ORDER FINDING PANOS
ELIADES AND PANIX OF
THE U.S., INC. IN
CONTEMPT

PLEASE TAKE NOTICE that New Jersey Sports Productions, Inc. d/b/a Main Events, by Dines and English, L.L.C. its attorney, moves the court pursuant to 18 U.S.C. §401 for an order finding Panos Eliades and Panix of the U.S., Inc. in contempt of this Court. This motion is based on the ground that both Panos Eliades and Panix of the U.S., Inc. have been duly served with an order of this Court, dated November 22, 2006 directing both parties to complete outstanding interrogatories and document demands, which order Panos Eliades and Panix of the U.S., Inc. has failed and refused, and still fails and refuses, to obey, as more fully shown by the attached affidavit of Jason M. Santarcangelo, Esq. sworn to on January 16, 2007, and by the attached copy of such order, together with proof of service on Panos Eliades and Panix of the U.S., Inc.


JASON M. SANTARCANGELO (JMS 4492)
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685 Van Houten Avenue
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Attorney for Plaintiff, New Jersey Sports Production, Inc.

Dated: January 18, 2007

Jason M. Santarcangelo, Esq. (JMS 4492)
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685 Van Houten Avenue
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Attorney for Plaintiff, New Jersey Sports Productions, Inc.

NEW JERSEY SPORTS PRODUCTIONS, INC :
d/b/a MAIN EVENTS

Civil Action No. 06 CV 1509 (HB)

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ORDER

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PANOS ELIADES, PANIX PROMOTIONS,
LTD., PANIX OF THE U.S., INC., BANNER
PROMOTIONS, INC., DON KING
PRODUCTIONS, INC. AND JOHN DOES 1-5 :

Defendants.

On reading, filing and considering the attached motion, affidavit and Memorandum of Law seeking issuance of an order requiring both Panos Eliades and Panix of the U.S., Inc. to show cause why they should not be adjudged in civil contempt for failing and refusing to obey this Court's order of November 22, 2006 requiring Panos Eliades and Panix of the U.S., Inc. to provide answers to the plaintiff's first set of interrogatories and provide the requested documents; and it appearing to the court that good cause exists for issuance of the order; therefore,

IT IS HEREBY ORDERED that:

- 1) Panos Eliades and Panix of the U.S., Inc., beginning three (3) days after service of this Order shall be fined \$2000.00 per day plus interest thereon, for each day that either party fails to obey this Court's lawful November 22, 2006 Order providing discovery;

- 2) Should Panos Eliades be found in the United States, he shall be incarcerated until he complies with the November 22 Order and this Order or until this Court shall otherwise Order.

Dated: _____, 2007

- 2) Should Panos Eliades be found in the United States, he shall be incarcerated until he complies with the November 22 Order and this Order or until this Court shall otherwise Order.

Dated: _____, 2007

JUDGE HAROLD BAER, JR., U.S.D.J.